

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KPM ANALYTICS NORTH AMERICA
CORPORATION,

Plaintiff,

v.

BLUE SUN SCIENTIFIC, LLC; THE INNOVATIVE
TECHNOLOGIES GROUP & CO., LTD; ARNOLD
EILERT; MICHELLE GAJEWSKI; ROBERT
GAJEWSKI; RACHAEL GLENISTER; GREGORY
ISRAELSON; IRVIN LUCAS; and PHILIP
OSSOWSKI,

Defendants.

Civil Action No. 4:21-cv-10572-
TSH

**AFFIDAVIT OF ROBERT WILT IN SUPPORT OF DEFENDANT THE INNOVATIVE
TECHNOLOGIES GROUP & CO., LTD'S MOTION FOR SUMMARY JUDGMENT
AND REQUEST FOR HEARING**

1. I, Robert Wilt, certify that I have personal knowledge of the facts set forth herein. I am over the age of eighteen, I currently reside at 22189 Bay Shore Rd., Chestertown, MD 21620, and am fully competent to testify to the facts in this declaration.
2. I am co-founder and sole owner of Defendant The Innovative Technologies Group & Co ("ITGC"), a Maryland Corporation, whose address is 8017 Dorsey Run Rd., Jessup MD 20794.
3. I understand that the Plaintiff in this case, KPM Analytics North America Corporation ("KPM"), has made allegations that some Blue Sun employees who were former employees of KPM improperly used KPM "customer lists" and other related KPM customer information in connection with their work for Blue Sun. I have never seen, reviewed or accessed KPM customer lists. ITG does not utilize any KPM trade secrets in its design and manufacture of its



